

Fill in this information to identify the case:

Debtor1 James A. Reynolds

Debtor 2 Tiffany M. Reynolds
(Spouse, if filing)

United States Bankruptcy Court for the : MIDDLE District of Pennsylvania
(State)

Case number 1:18-bk-01044-HWV

Form 4100R

Response to Notice of Final Cure

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Mill City Mortgage Loan Trust 2016-1, Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust as Trustee

Court claim no. (if known): 7-1

Last 4 digits of any number you use to identify the debtor's account: 8075

Property address: 4996 STATE HWY 42
Number Street

UNITYVILLE, PA 17774

City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full amount required to cure the prepetition default on the creditor's claim
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 6/12/2023
MM/DD/YYYY

- ☐ Creditor states that the debtors are not current on all postpetition payments consistent with § 1322 (b)(5) of the Bankruptcy Code, including all fees charges expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow and costs outstanding: + (b) \$ _____
- c. Total. Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM/ DD/ YYYY

Part 4: **Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☒ all payments received;
☒ all fees, costs, escrow, and expenses assessed to the mortgage; and
☒ all amounts the creditor contends remain unpaid

Part 5: **Sign Here**

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim

Check the appropriate box:

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

☒ /s/ Christopher Salamone
Signature

Date 06/07/2023

Print Christopher Salamone
First Name Middle Name Last Name Title Authorized Agent

Company Robertson, Anschutz, Schneid, Crane & Partners, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 130 Clinton Rd #202
Number Street

Fairfield, NJ 7004
City State ZIP Code

Contact 470-321-7112 Email csalamone@raslg.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 12, 2023 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and a true and correct copy has been served via United States Mail to the following:

JAMES A. REYNOLDS
202 POWELLS VALLEY ROAD
HALIFAX, PA 17032

TIFFANY M. REYNOLDS
202 POWELLS VALLEY ROAD
HALIFAX, PA 17032

And via electronic mail to:

IMBLUM LAW OFFICES, P.C.
4615 DERRY STREET
HARRISBURG, PA 17111

JACK N ZAHAROPOULOS
STANDING CHAPTER 13 (TRUSTEE)
8125 ADAMS DRIVE,
SUITE A
HUMMELSTOWN, PA 17036

UNITED STATES TRUSTEE
228 WALNUT STREET,
SUITE 1190
HARRISBURG, PA 17101

By: /s/ *Justine Bennett*
Justine Bennett
Email: Jusbennett@raslg.com